

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 20-cv-954**

FARHAD AZIMA,

Plaintiff,

v.

NICHOLAS DEL ROSSO and VITAL
MANAGEMENT SERVICES, INC.,

Defendants.

**DECLARATION OF IAN A.
HERBERT IN SUPPORT OF
PLAINTIFF'S NOTICE OF
SUPPLEMENTAL MATERIALS**

I, Ian A. Herbert, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury the following:

1. I am counsel at the law firm of Miller & Chevalier Chartered, 900 16th Street NW, Washington, D.C., 20036. I am a member in good standing of the bar of the District of Columbia Bar and I have made a special appearance in this Court on behalf of Plaintiff Farhad Azima. Docket No. 19.

2. I attach hereto as Exhibit 1 a true and correct copy of Kotak Mahindra Bank records filed in the matter styled *In re* Application of KARAM SALAH AL DIN AWNI AL SADEQ and STOKOE PARTNERSHIP SOLICITORS for an Order Under 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings, No. 1:21-MC-00006 (M.D.N.C.).

3. An attorney at my firm used PACER to retrieve the Exhibit from the Declaration of Haralambos Tsiattalou filed with the Application described above. The Exhibit was Exhibit G to Mr. Tsiattalou's Declaration. *See* Docket No. 4, Exhibit G.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 8, 2021, in Washington, D.C.



Ian A. Herbert

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Defendants.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing DECLARATION OF IAN A. HERBERT IN SUPPORT OF PLAINTIFF'S NOTICE OF FILING SUPPLEMENTAL MATERIALS with the Clerk of Court using the CM/ECF system, which will send electronic notification of this Notice to the following attorneys:

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This, the 8th day of February, 2021.

WOMBLE BOND DICKINSON (US) LLP

/s/ Ripley Rand

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